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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Phil Gramm
United States Senate
Washington, D.C. 20510

Dear Senator Gramm:

I am writing you on behalf of the 100,000 listeners of KPAC-FM and KSTX-FM in the San Antonio area regarding the Federal Communications Commission's recent decision to authorize the creation of a low-power FM service, commonly referred to as LPFM.


The enclosed press release from National Public Radio summarizes our concerns about the FCC's action in this matter. The FCC has failed to take sufficiently into account the potential for LPFM interference with existing FM signals such as those of our stations here in San Antonio. Moreover, the FCC made its decision without having decided on a new digital standard for radio broadcasting or having any real knowledge about the impact LPFM will have on proposed digital transmission methods.

I urge you to contact FCC Chairman William Kennard to ask that the FCC await the results of comprehensive on-air interference testing and the resolution of a number of related questions before issuing LPFM licenses. The FCC must also create a swift, fair process to remedy any interference to full service stations, existing translators and radio reading services for the blind.

In addition, I ask that you sign on as a cosponsor to S.2068 introduced by Senator Judd Gregg. The purpose of this bill is to reverse the FCC's action.

If you or your staff have any questions, please don't hesitate to contact me.

Sincerely,


Joe Gwathmey
President

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Joe

From:
Sent:
Subject:

Erica Reid [ereid@NPR.ORG]
Thursday, March 16, 2000 4:25 PM
NPR Message from Communications

For Immediate Release

Contact: Siriol Evans 202-414-2313
sevens@npr.org

March 16, 2000

NPR FILES PETITION FOR RECONSIDERATION AND
MOTION FOR STAY OF FCC'S LOW POWER FM RULES

Washington, DC-National Public Radio* (NPR*) today formally requested that the Federal Communications Commission (FCC) reconsider and delay implementation of its recent decision to license Low Power FM (LPFM) stations. Because the FCC's current order could cause significant interference to existing NPR member stations, as well as their radio reading services for the blind and visually-impaired, NPR's Petition for Reconsideration filed today seeks revision of the rules. More than a third of NPR's member stations provide radio reading services which are carried on subcarrier channels. NPR's Motion to Stay filed today seeks to delay implementation of the rules until July 15, 2000, which provides the FCC with ample time to address NPR's petition and permits completion of further FCC lab tests and NPR field tests measuring potential interference.

"We believe that public radio and low power FM could provide different but complementary services to Americans. However, the FCC's current rules threaten to disrupt existing service to public radio listeners, especially those in rural areas served by translator stations, and blind or visually-impaired Americans who utilize radio reading services," says NPR President and CEO Kevin Klose. "We are asking the FCC to take a few extra months to reconsider and modify its rules before forging ahead with a policy that endangers the distribution of unique, standard-setting public radio programming to Americans who rely on it."

The FCC's current LPFM rules eliminate long-standing interference protections to full-power public radio stations. NPR's Petition for Reconsideration seeks the following changes:

- * That LPFM station applications on a 3rd adjacent channel to a full-power, translator or booster station be subject to challenge and dismissal if it can be shown that the LPFM station would create interference to the reception of a regularly received off-the-air service within the existing station's 1.0 mV/m (60 dBu) contour.

- * That the 3rd adjacency protection be maintained for full-power stations and their translators that provide radio reading services.

- more -

- * That translator licenses displaced by full-power stations be permitted to restore service to their prior service area. The FCC should otherwise authorize translator stations that are the subject of Public Telecommunications Facilities Program grant, without regard for the operation of LPFM stations. And, LPFM licensees and applicants should be explicitly required to protect the input channels of translator stations.

- * That, pending additional lab and field testing of In Band On Channel

systems, the FCC must maintain existing interference protections or clarify that LPFM stations are authorized on a secondary basis to all full-powered stations and translator and booster stations operating pursuant to a DAB authorization.

NPR's upcoming field tests will gauge the potential for interference from LPFM stations to public radio stations and their translator networks, as well as subcarrier channels offering radio reading services. The tests will include actual on-air interference tests of potential LPFM stations based on the FCC's currently proposed rules. NPR will also investigate the susceptibility to interference of SCA receivers used by listeners to radio reading services.

Public radio stations are highly vulnerable to interference for several reasons. For instance, stations operating on the reserved FM-band spectrum (87.9 to 91.9 FM, where approximately 90 percent of public radio stations are located) are more tightly crowded together on the dial than those outside of the reserved spectrum. Also, public radio signals are "lightly processed," which means they utilize minimum loudness processing to preserve the natural dynamic range inherent in jazz, classical music and news/talk programming.

Renowned for its journalistic excellence and standard-setting news, information, and cultural programming, NPR serves a growing audience of 14.6 million Americans each week via 625 public radio stations. NPR Online is available at www.npr.org. NPR also distributes programming to listeners in Europe, Asia, Australia and Africa via NPR Worldwidesm, to military installations overseas via American Forces Network and throughout Japan via cable.

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